

Internal Memorandum

DATE: January 15, 2016
TO: Dave Emme, Administrator
FROM: Christine Andres, Chief, Bureau of Federal Facilities
SUBJECT: Quarterly Report: October 1, 2015 to December 31, 2015

FEDERAL FACILITY AGREEMENT AND CONSENT ORDER

(FFACO) QUARTERLY REPORT

Industrial Sites Activity

At the end of December 2015, there were 1958 Corrective Action Sites (CASs) (out of 1970 total) that have been closed, with two CASs in Corrective Action Unit (CAU) 114 and four CASs in CAU 575, all in various stages of active investigation, and six CASs in CAU 572 held for future work.

Soils Activity Sites

At the end of December 2015, there were 115 CASs (out of a total of 138) that have been closed, with 23 in various stages of active investigation.

During this quarter, Bureau of Federal Facilities (BFF) staff reviewed FFACO and non-FFACO documents and related correspondence, participated in project evaluations, attended local meetings related to CAU closures and the Nevada Division of Environmental Protection (NDEP) environmental support contract, developed tasking documents for the environmental support contract, organized and participated in technical training sessions funded by the contract and conducted site inspections of CAU 568.

Document Review:

DRAFT SOILS ACTIVITY QUALITY ASSURANCE PLAN (SOILS QAP) – Staff began review of this non-FFACO document, as requested by NNSA/NFO.

CAU 413 – Clean Slates II Plutonium Dispersion Site, Tonopah Test Range (TTR), Nevada – BFF staff reviewed a Preliminary Draft of the Corrective Action Investigation Plan (CAIP) without comment. The document was provided as a “courtesy” copy after NDEP raised concerns about extensive site characterization proceeding without an approved CAIP for this CAU.

CAU 541 – Small Boy, NNSS, Nevada – BFF staff reviewed the Draft Corrective Action Decision Document/Closure Report (CADD/CR) and submitted comments to be addressed in the final document.

Meetings and Training:

BFF staff organized and attended two training sessions under the environmental services contract. The training was delivered by a Stoller Newport News Nuclear, Inc. (SN3) Certified Health Physicist and focused on radiological detection instruments and data, and an introduction to the radiological modeling software, RESRAD. These data and models are routinely presented in FFACO documents which form the basis for NDEP document review, approval and site closure.

Staff participated in a Corrective Action Alternatives/Data Quality Objective (CAA/DQO) meeting for CAU 573 (Alpha Contaminated Sites).

Staff met with National Nuclear Security Administration/Nevada Field Office (NNSA/NFO) personnel and their contractors to discuss the FY16 scope of work, legacy contamination outside the Contamination Area fence at CAU 413 (Clean Slate II), and a comparison of United States Air Force (USAF) and NFO preliminary TLD data, and the upcoming CAU 541 CAA meeting.

Staff attended a DQO meeting for CAU 568 (Area 3 Plutonium Dispersion Sites) and requested updated DQO documents and slides to reflect revisions to the DQOs.

Document Preparation:

Staff prepared and sent two tasking letters to the SN3 environmental services contractor for training and consultation and document review. Invoices were processed when received.

Site Visits:

Staff traveled to the Nevada National Security Site (NNSS) to inspect portions of CAU 568 (Area 3 Plutonium Dispersion Sites) and better understand radiological releases requiring verification of corrective action for closure approval, and to concur with changes to the DQOs and CAAs as originally proposed. Staff prepared an inspection report summarizing observations made during the visit.

Underground Test Area (UGTA) Activity

There are five UGTA CAUs, all of which are in various stages of active investigation or model evaluation.

During this quarter, BFF staff participated in the process of document review, project evaluation, meetings and/or site visits for all five of the CAUs in the following ways:

Document Reviews and Letters:

CAU 97 – Yucca Flat – As a member of the Yucca Flat pre-emptive review committee, BFF staff have been reviewing the material from the modeling team's suggested approaches to addressing the External Peer Review's comments in preparation for an early February 2016 presentation by DOE and their contractors on comment responses.

CAU 99 – Rainier Mesa / Shoshone Mountain (RM/SM) – As a member of the RM/SM pre-emptive review committee, BFF staff submitted comments related to the HFM prime model being used for this CAU.

CAU 101/102 – Pahute Mesa – As time allowed, staff continued reviewing various approaches to modeling fractures and faults that may be used in modeling this CAU, as well as, documentation for an overall possible modeling approach for use on this CAU. Staff reviewed the field reports on the drilling of Well ER-20-12.

Site Visits:

Staff observed drilling activities at well ER-20-12 on Pahute Mesa on six different occasions during this quarter.

Nevada Off-Sites

There are four Nevada Off-Sites CAUs, two Surface CAUs (CAU 416 and 417) and two Subsurface CAUs (CAU 443 and 447). CAU 416 has been clean-closed. CAU 417 is in Post-Closure Monitoring. CAU 447 is in the Corrective Action Decision Document/Corrective Action Plan Stage and is undergoing further site evaluation. CAU 443 is in the Draft Closure Report Stage.

During this quarter, BFF staff participated in the process of document review, project evaluation, conference calls and/or meetings for the three active CAUs:

Document Reviews:

CAU 443 – Central Nevada Test Area (CNTA), Subsurface – BFF staff reviewed the Draft Closure Report for this CAU and submitted comments to the DOE/OLM. A response-to-comments was reviewed by BFF staff and several minor follow-up comments were submitted. A final Closure Report will be received next quarter.

CAU 447 – Project Shoal Area (PSA), Subsurface – BFF staff reviewed the 2014 Well Completion Report and issued a letter acknowledging receipt of this supplemental work product.

Meetings:

BFF staff met to discuss compiled Draft Closure Report comments for CNTA.

Site Visits:

Staff observed water level downloads and conducted inspections at both the CNTA and PSA sites.

Miscellaneous

The chief attended the Division Staff Meeting in Carson City on October 5 and November 16. The meetings on October 19 and November 2 were participated in via conference call. While in Carson City for the meetings, various other bureau business was conducted.

The chief attended a Nevada Site-Specific Board Meeting (NSSAB) as the NDEP liaison in November and participated in a tour of the NNSS for the board members and liaisons on October 15.

The BFF supervisor participated in a NSSAB tour of the NNSS and U1a in December.

As a member of the National Governor's Association's Federal Facilities Task Force, the Chief and Deputy Administrator attended the Fall Intergovernmental Meeting in New Orleans, LA in November.

The Bureau Chief is participating in a work group for establishing an e-Records system for the Agency.

Training:

BFF staff continued cross-training activities for other BFF projects. Staff attended three training presentations provided by SN3 staff under current BFF contracts.

Staff completed their 4-hour online portion of the 8-hour OSHA Hazwoper Refresher course.

Staff completed their OSHA annual physical exams after a staff member coordinated this yearly event.

Agreement in Principle (AIP) Functional Areas Summary

1. On-Site Discharges

Water Pollution Control

Document Reviews:

Water Pollution Control Permit GNEV 93001 – Bureau of Federal Facilities (BFF) staff reviewed the July 1 through September 30, 2015 Quarterly Discharge Monitoring Report (QMR). With the temporary waiver from the use of the calculated flow limit for the DAF sewage lagoon system as a permit limit, granted by the BFF in the first quarter of SFY 16, the facilities at the NNSS are in compliance with the current permit.

Water Pollution Control Permit GNEV 96021 – BFF staff reviewed the quarterly E-tunnel Waste Water Disposal System QMR for the Permit and sent a letter stating it was compliant.

Site Visits:

There were two site visits to the NNSS this quarter. BFF staff also conducted the Annual Water Haulers Inspections.

Spills

The Nevada Division of Environmental Protection (NDEP) sent a letter to the National Nuclear Security Administration/Nevada Field Office (NNSA/NFO) requesting corrective action for spills described in Spill Report Nos. 150625-01 and 150729-05.

2. Ground Water Monitoring

There was no activity in this category during this quarter.

3. Air Quality Monitoring

There was no activity in this category during this quarter.

4. Low Level and Mixed Low Level Waste Oversight

Conference Calls:

Staff participated in weekly Waste Acceptance Review Panel (WARP) meetings in person and/or via teleconference. Review panel meetings were held on October 7, 14, 21; November 4, 11, 18, 25; and December 2, 9, 16, and 23, 2015. Review panel members discussed waste profile comments and waste-specific compliance issues for generator-submitted low-level and mixed low-level radioactive waste profiles as they pertain to NNSSWAC, Rev. 10a. As applicable,

BFF staff reviewed and provided comments on low-level radioactive waste and mixed waste profiles (for compliance with NNSSWAC, Rev. 10a) and reviewed all comment responses submitted by the currently-approved Low-Level Waste and Mixed Low-Level Waste generators.

Meetings:

Staff attended a technical presentation provided by BFF's contractor, Stoller Newport News Nuclear, Inc. (SN3), under Contract #15-029, on October 6, 2015; presentation topic included the use of radiological instrumentation.

Staff attended the NFO's Radioactive Waste Generator's Workshop held on October 28, 2015 in Las Vegas. The Bureau Chief presented on NDEP's Involvement in DOE's Radioactive Waste Acceptance Program and Low-Level Waste.

Staff attended a technical presentation provided by contractor SN3, under Contract #15-028, on December 8, 2015; presentation topic consisted of Radiological Characterization methods.

Site Visits/Radioactive Waste Generator Facility Evaluations:

Staff visited the Area 5 Radioactive Waste Management Site (RWMS) to observe incoming waste shipments and verify associated required documentation for random shipments.

Completed radiological survey tasks under Contract #15-028 on October 29 and December 16, 2015 at the Area 5 RWMS; contracted with SN3 to collect real-time data for incoming waste shipments at the NNSS Area 5 RWMS.

Staff participated in a waste generator facility evaluation November 16-20, 2015 at the Savannah River Site in Savannah, Georgia.

Document Preparation:

Staff submitted a request for technical review of radioactive waste profiles and related documents under RFP BFF 15-028 on October 27, 2015. Contractor SN3 completed the technical review.

5. Waste Management

Document Review:

The Bureau issued the NV HW0101 permit renewal, effective December 10, 2015, after receiving and accepting the forty-one (41) comment resolutions submitted by the NNSA/NFO.

The Bureau received and reviewed a Class I Permit Modification request for permit SW 532 to add three additional low-level/asbestos waste disposal cells to the permit. The Bureau had three comments to be addressed by the NNSA/NFO. Once the Bureau receives the comment responses, the Bureau will issue a revised permit to the NNSA/NFO.

Staff also reviewed: (1) a request to properly dispose of beryllium in the U10c landfill; (2) a request to modify RCRA post closure requirements in RCRA permit NEV HW0101; (3) the third quarter asbestos acceptance report for Area 5; and, (4) letters detailing inadvertent intrusions into two use restrictions on the NNSS.

Finding of Alleged Violations (FOAV):

The NDEP conducted a show cause meeting on October 7, 2015 with representatives from NNSA/NFO and their contractor, NSTec, in regards to the FOAV issued for the June 24, 2105 drum fire on the NNSS. The NDEP issued a Final Findings on December 4, 2015 during a Settlement Meeting. The NNSA/NFO accepted the Final Findings and will propose a Supplemental Environmental Project (SEP) early next quarter.

Meetings:

CAU 111– NNSA/NFO and BFF personnel met on October 21, 2015 at the request of the bureau to discuss a path forward for CAU 111 re-vegetation.

NEV HW0101 Permit Renewal – Several meetings were held with DOE personnel prior to NDEP issuing the permit renewal.

Repackaging of NFS Drums – A meeting was held with DOE and contractor personnel in preparation for the repackaging of these drums.

Site Inspections:

Annual Solid Waste Disposal Site (SWDS) Inspection – BFF staff prepared for, and conducted a follow-up inspection on November 3, 2015 after the Bureau received a response from the NNSA/NFO stating the corrective actions had been completed to close out observations made during a SWDS inspection on July 6, 2015. During this follow-up inspection, NDEP determined two of the five observations were not satisfactorily corrected. These unsatisfactory corrective actions were cited in a November 9, 2015 NDEP letter to NNSA/NFO. The Bureau conducted a second follow up inspection on January 5, 2016, to verify all corrective actions have indeed been implemented and found all the corrective actions sufficient.

RCRA Quarterly Post-Closure Monitoring (PCM) Inspections – BFF staff prepared for, and conducted, quarterly post-closure monitoring inspections for closed RCRA permitted sites on the NNSS.

Annual FFACO PCM Inspections – BFF staff conducted seven field visits in October, November and December to multiple CAU's with NNSA/NFO and Navarro personnel as part of the post-closure monitoring program for closed non-RCRA FFACO sites.

6. Major Program Proposals

There was no activity in this category during this quarter.

7. Historic Preservation

Funding has been provided to the SHPO for historic reviews at DOE and/or the NNSS during the year.

8. Environmental Monitoring Program and Report

There was no activity in this category during this quarter.

9. Sampling

No sampling activities were conducted by the Bureau during this quarter

10. Safe Drinking Water

Site Visits:

There were two site visits this quarter. BFF staff conducted the Annual Water Haulers Inspections.

Fiscal Analysis:

Estimate of personnel resources used (FTE or hours)

The bureau of Federal Facilities is made up of a Bureau Chief, two supervisors, six technical staff and an administrative assistant. Currently, one supervisor and one sanitary engineer position are vacant. The AIP grant funds activities for each of these individuals. For the quarter, that represents approximately 4.5 FTEs based on a review of grant related activities.

Total expenditures for each task area

A total of \$109,598.66 was spent this quarter for AIP work. This is the most current figure available at this time and includes personnel, operating, information services, DOE and DOE oversight and purchasing costs.

Comparison of estimate to budgeted expenses:

Expenses this quarter were within the legislatively-approved spending limits.

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